



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

August 8, 2019

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
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BY: Peter Blumberg *PGB*
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RE: MURs 6960 & 6991 (SW Technologies, LLC)
Pre-Probable Cause Conciliation

I. INTRODUCTION

On July 11, 2017, the Commission found reason to believe that SW Technologies, LLC d/b/a Advocacy Data ("SWT") violated 52 U.S.C. § 30111(a)(4) by compiling a commercial mailing list with the names and addresses of contributors obtained from Complainants' FEC disclosure reports and authorized the use of compulsory process.¹ Following an investigation, on June 25, 2019, the Commission decided to enter into pre-probable cause conciliation with SWT and approved a proposed conciliation agreement.²

¹ Certification ¶ 2(a), (d), MURs 6960 & 6991 (SWT, *et al.*) (July 12, 2017).

² Certification ¶¶ 1-2, MURs 6960 & 6991 (SWT, *et al.*) (June 26, 2019).

II. DISCUSSION

Accordingly, we find the inclusion of this contention language to be acceptable, especially given that SWT agreed to pay the full civil penalty amount.

III. RECOMMENDATIONS

1. Accept the signed conciliation agreement with SW Technologies, LLC;
2. Approve the appropriate letter; and
3. Close the file.